

Via FOIA Online and U.S. Mail

February 11, 2022

National Freedom of Information Officer
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (2310A)
Washington, DC 20460

Re: Freedom of Information Act Request

Dear Sir or Madam:

Pursuant to the Freedom of Information Act ("**FOIA**"), 5 U.S.C. § 552, we respectfully request copies of all records, documents, correspondence, files, reports, electronic mail, faxes, microfilm, photographs or other information or portions thereof (collectively, "**Records**") in the possession of U.S. Environmental Protection Agency ("**EPA**"), including but not limited to EPA Region 2, that pertain to the below request.

1. Records relating to the Brillo Landfill Site, located in Victory, New York (the "**Site**") that refer to, reflect, or otherwise are associated with or in any way show a connection to Occidental Chemical Corporation.
2. Records relating to the Site that refer to, reflect, or otherwise are associated with or in any way show a connection to Diamond Chemicals Company.
3. Records that refer to, reflect, or otherwise are relevant in determining the source(s) of drums, other containers, and any other chemicals, materials and/or wastes that were handled, disposed or otherwise came to be located at the Site.
4. Records that refer to, reflect, or otherwise are relevant in determining the identity of any chemicals, materials and/or wastes that were handled, disposed or otherwise came to be located at the Site.

This request is for all responsive materials, regardless of the date.

LUKE DONIGAN

DIRECT 716 847 7033 LDONIGAN@PHILLIPSLYTLE.COM

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We prefer that the Records be produced in an electronic format. For hard-copy documents, we will pay any reasonable fee provided for in the FOIA associated with copying the Records. Please contact us with an estimate prior to incurring costs.

FOIA requires that an agency respond to a written request within twenty (20) business days of receipt of a request. If, for any reason, any portion of our request is denied, please inform us of the reasons for the denial, in writing, together with the name and address of the person or body to whom an appeal should be directed.

Finally, if you have any questions with respect to the request, or would like to discuss an electronic file-transfer protocol, please contact me. Thank you in advance for your assistance.

Sincerely,

Phillips Lytle LLP

By

A handwritten signature in black ink, appearing to read 'Luke Donigan', with a stylized flourish at the end.

Luke Donigan

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